

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
No. 20-cv-02156 (SRN/LIB)

Paul Hansmeier,

Plaintiff,

v.

David MacLaughlin, Benjamin Langer, Erica
MacDonald, John Doe

Defendants.

**REQUEST FOR EXTENSION
OF TIME TO ANSWER OR
RESPOND**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants David MacLaughlin, Benjamin Langer, and Erica MacDonald respectfully request an extension of time to answer or otherwise respond to the Complaint.

1. The Complaint was removed to this Court on October 13, 2020. Doc. 1.
2. The Complaint was delivered to the Office of the United States Attorney for the District of Minnesota on September 25, 2020. Normally, the United States, its agencies, officers, or employees may serve an answer or otherwise respond to a complaint within 60 days of service on the United States Attorney. *See* Fed. R. Civ. P. 12(a)(2). Nevertheless, when a complaint is removed to federal court, an answer or response to the complaint is due in as little as seven (7) or twenty-one (21) days, without regard to a Defendant's status as an agency, officer, or employee of the United States. *See* Fed. R. Civ. P. 81(c)(2).
3. Defendants are sued in their official capacity, *see* Doc. 1 at 1, as employees of the United States Department of Justice, an agency of the United States. Defendants

accordingly seek leave to answer or otherwise respond to the Complaint within the regular 60-day timeframe provided by Rule 12(a)(2), i.e., by November 24, 2020.

4. This request is not made for any dilatory purpose and good cause exists for the requested extension of time. The Complaint raises allegations that require inquiry and coordination with Defendants and the United States Department of Justice. Undersigned counsel needs sufficient time to prepare an appropriate answer or response to the Complaint.
5. Plaintiff's position regarding this request is not known and not readily ascertainable due to his incarceration.
6. A Proposed Order granting this Request will be filed on CM/ECF and e-mailed to chambers.

Dated: October 15, 2020

ERICA H. MacDONALD
United States Attorney

s/Roylene A. Champeaux

By: ROYLENE CHAMPEAUX
Assistant United States Attorney
Attorney ID Number 154805
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
(612) 664-5685
roylene.champeaux@usdoj.gov

Attorneys for Defendants